

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA,

Plaintiff,

CASE NO. 00-6273-CR-HUCK

VS.

ANTHONY BANKS,

Defendant.

/

NIGHT BOX
FILED

JL OCT 15 2004

CLARENCE MADDOX
CLERK, USDC / SDFL / MIA

DEFENDANT'S UNOPPOSED MOTION FOR PERMISSION TO TRAVEL

COMES NOW the Defendant, ANTHONY BANKS, by and through his undersigned counsel, and respectfully requests this Honorable Court enter an Order granting him permission to travel. As grounds therefore, it is respectfully submitted:

1. Defendant is in the Home Confinement Electronic Monitoring Program for 120 days at the Last House Recovery Program.

2. Defendant's sister, Kimberly Ann Banks, is getting married on November 6, 2004 in Fort Myers/Buckingham, Florida and the Defendant is to be the best man. His presence would be needed at the wedding rehearsal on Friday, November 5, 2004 and his return date would be on Sunday, November 7, 2004. See Kimberly Banks letter, dated October 3, 2004, and a copy of the wedding invitation, attached hereto as Composite Exhibit No. 1.

3. If granted permission to travel, the Defendant would be staying at his sister's house located at 116 Ivan Ave. South, Leigh Acres, Florida 33990; (239) 369-8394.

4. The three (3) days of travel, wherein their would be no home confinement, would be added on to extend the completion date of Home Confinement by three (3) days.

USM
JFK

5. Assistant United States Attorney Jeffrey Sloman and Odine Lindor, U.S.

Probation Officer, have no opposition/objection to the granting of this motion.

WHEREFORE, the Defendant, ANTHONY BANKS, respectfully requests that this Honorable Court enter an Order permitting him to travel as stated above during the time period set forth in this Motion.

Respectfully submitted,

MANUEL GONZALEZ, JR., ESQ.
2222 PONCE DE LEON BLVD.
SUITE 500
CORAL GABLES, FLORIDA 33134
(305) 444-1400
(305) 444-1487 (FAX)

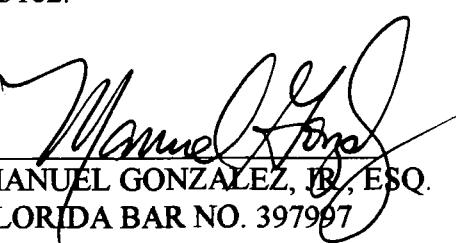
BY:


MANUEL GONZALEZ, JR., ESQ.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing document was mailed this 15th day of October 2004 to: Jeffrey Sloman, AUSA, 99 N.E. 4th Street, Miami, Florida 33132-2111, Odine Lindor, U.S. Probation Officer, 14601 Oak Lane, Miami Lakes, Florida 33016, and Thomas Daniels, The Last House Recovery Program, 1960 South Glades Drive, North Miami Beach, Florida 33162.

BY:


MANUEL GONZALEZ, JR., ESQ.
FLORIDA BAR NO. 397997

October 3, 2004

To whom it may concern:

I Kimberly Banks would like to request the presence of my brother Anthony Banks to my wedding rehearsal on Friday, November 5, 2004 and Saturday, November 6th, in which he is the Best Man. The wedding will take place in Fort Myers, Fl. This is a very special day for me and my family and I would like the opportunity to have him as an active participant. I have enclosed an invitation to the wedding for your review. If there is any other verification that you may need from me, I can be contacted at 239-369-8394. My fiancé, Richard Day can also be contacted at 239-297-3797.

Thank You,

Kimberly Banks

A handwritten signature in black ink, appearing to read "KIMBERLY BANKS". It is written in a cursive style with some loops and variations in letter height.

DEFENDANT'S COMPOSITE
EXHIBIT NO. 1

Mr. Crawford Banks
requests the pleasure of your company
at the marriage of his daughter

Kimberly Ann

10

Richard Kendall Day
Saturday, the sixth of November
Two thousand and four
at four o'clock
The Hut
Buckingham, Florida

Reception to follow No. 1.
Defendant's Composite Exhibit